

To: Restivo, Angela[Restivo.Angela@epa.gov]
From: Foster, Althea
Sent: Mon 8/10/2015 2:10:54 PM
Subject: FW: Questions about pretreatment

From: Benson, Bob
Sent: Monday, August 10, 2015 9:06 AM
To: Way, Steven; Foster, Althea; Brobst, Bob; OBrien, Wendy
Cc: Griswold, Hays; Graham, Richard; McKean, Deborah
Subject: RE: Questions about pretreatment

The concern about using polyacrylamide coagulants in a public water supply is the possible presence of residual acrylamide in the product. There is no good method for measuring acrylamide monomer in finished drinking water so the "MCL" is based on a treatment technique to insure that any residual acrylamide in the finished water is at a safe level. The process to ensure that the a Public Water Supply will meet the rule (40 CFR 141.111) is the requirement that only NSF certified products be used by the Public Water Supply.

Brennfloc AP 2631 is not certified by NSF for use in a public water supply. Another of the company's products (Brennfloc AP 7362) is NSF certified.

I am not sure where the AP 2631 product is being used. If the treated water is not being used as a direct source for a Public Water Supply, then I don't think 40 CFR 141.111 applies.

From: Way, Steven
Sent: Sunday, August 09, 2015 9:31 PM
To: Foster, Althea
Cc: Griswold, Hays; Graham, Richard; McKean, Deborah; Benson, Bob
Subject: RE: Questions about pretreatment

Althea,

Here is the flocculent product information:

Brennfloc AP 2631, and is manufactured by Brentag (480-961-4189). The flocculent is a polyacrylamide based compound. Below is a link to an EPA fact sheet about acrylamide coagulants in drinking water.

Also I sent Ronnie information about the system in which we have used the flocculent for the temporary treatment activity. The treatment operations will likely change, but as temporary measure to drop the suspended metals compounds these compounds are being used.

As for the temporary settling pond retention times, I do not have that information right now. Collectively it is on the order of several hours as I understand it. The situation is dynamic, the flows continue to vary and operations are underway to route the mine water to other settling cells. Hopefully this information is sufficient for the time being.

<http://water.epa.gov/drink/contaminants/basicinformation/acrylamide.cfm>

Steven Way

Federal On-Scene Coordinator

Emergency Response Unit

US EPA - Region 8

1595 Wynkoop Street

Denver, CO 80202

Office: 303-312-6723

From: Foster, Althea

Sent: Sunday, August 09, 2015 8:19 PM

To: Way, Steven

Cc: Crossland, Ronnie; Restivo, Angela; Webster, Susan; Petersen, Chris; Martin, John; Cristiano, Gina; Farris, Laura

Subject: Fwd: Questions about pretreatment

Steve,

We have been directed to you by your REOC as the point-of-contact who can help us answer the questions below. Can you help us?

Sent from my iPad

Begin forwarded message:

From: "Restivo, Angela" <Restivo.Angela@epa.gov>

Date: August 8, 2015 at 2:31:19 PM CDT

To: "Crossland, Ronnie" <Crossland.Ronnie@epa.gov>

Cc: "Foster, Althea" <Foster.Althea@epa.gov>, "Webster, Susan" <webster.susan@epa.gov>, "Loesel, Matthew" <loesel.matthew@epa.gov>, "Petersen, Chris" <petersen.chris@epa.gov>, "Martin, John" <martin.john@epa.gov>, "Rauscher, Jon" <Rauscher.Jon@epa.gov>, "Turner, Philip" <Turner.Philip@epa.gov>, "Brown, Cynthia" <Brown.Cynthia@epa.gov>

Subject: Questions about pretreatment

In order to plan for possible affect to drinking water systems and estimate when these systems should come back online the following questions need to be answered.

Specifically what type of coagulant is being used to treat the water?

Is the water being treated in the holding pond being released to the Animas River?

If so holding time for this releasing?

Is care being taken to ensure that floc is not leaving the treatment area?

Are samples of the treated water being collected?

Are they also conducting field monitoring for standard water quality parameters (pH, DO, turbidity, temp) prior to releasing?

Angela Restivo

Compliance Officer

Drinking Water Section

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